

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

Republic Steel  
2633 Eighth Street N.E.  
Canton, Ohio 44704

**ATTENTION:**

Mike Eberhart  
Director of Environmental Services, Air  
meberhart@republicsteel.com

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Republic Steel (Republic or you) to submit certain information about the facility at 2633 Eighth Street N.E. in Canton, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Republic owns and operates an emission source at the Canton, Ohio facility. We are requesting this information to determine whether you are complying with your federally enforceable operating permits and the Ohio state implementation plan.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. Republic must send all required information by electronic mail to [r5ardreporting@epa.gov](mailto:r5ardreporting@epa.gov), [prentice.dakota@epa.gov](mailto:prentice.dakota@epa.gov), and [sutlin.david@epa.gov](mailto:sutlin.david@epa.gov). If you are unable to make your submission

to these addresses due to email size restrictions, if you intend to assert a claim of business confidentiality for any of the information responsive to this request as explained below, or if there are other problems, use these email addresses to make additional arrangements to send any required information.

Republic must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Republic to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Dakota Prentice at 312-886-6761 or David Sutlin at (312) 353-8990.

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance  
Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission through electronic mail to the addresses provided above.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question.
5. Do not submit any documents you intend to claim as Confidential Business Information (CBI) through email. If you intend to claim any portion of your response to this request as CBI, please contact [r5ardreporting@epa.gov](mailto:r5ardreporting@epa.gov), [prentice.dakota@epa.gov](mailto:prentice.dakota@epa.gov), and [sutlin.david@epa.gov](mailto:sutlin.david@epa.gov) to make other arrangements for submission of this information.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

## **Appendix B**

### **Information You Are Required to Submit to EPA**

Pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within three days of receipt of this request, Republic Steel must submit all reports provided to Ohio EPA and Canton Air Pollution Control responsive to Paragraph 32 of the July 2, 2021 Ohio Consent Order for Preliminary Injunction (“COPI”), Case No. 2021CV00949, specifically “an engineering study of the [Continuous Bloom Casting Facility] and Flexcast vacuum tank degasser (“VTD”) to determine if either are a potentially significant source for offsite migration of lead including the evaluation of capture efficiencies for different operating scenarios, recirculating water lead content and capture control of the steam exhaust from VTD. [Republic Steel] shall submit a report including the proposed alternatives selected, if any, to Ohio EPA and Canton Air Pollution Control for review and Ohio EPA approval.”